

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 03-81030.

v.

HON. ROBERT H. CLELAND

D-1 MAHMOUD YOUSSEF KOURANI,

VIO. 18 U.S.C. § 371

Defendant.

FIRST SUPERSEDING INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE: (Conspiracy to Provide Material Support to a Foreign Terrorist Organization – 18 U.S.C. § 371)

D-1 MAHMOUD YOUSSEF KOURANI

From on or about November 6, 2002 through on or about December 6, 2002, within the Eastern District of Michigan, Southern Division, MAHMOUD YOUSSEF KOURANI, defendant herein, knowingly and willfully conspired with others known and unknown to the government to violate 18 U.S.C. § 2339B, that is, to provide material support in the form of monetary instruments and U.S. currency to Hizballah, also known as "Party of God," which had previously been designated by the United States Secretary of State as a foreign terrorist organization under Title 8, United States Code, Section 1189(a)(1); all in violation of Title 18, United States Code, Section 371.

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OVERT ACTS

In furtherance of the conspiracy, and to effect the objects thereof, defendant and his co-conspirators committed and caused to be committed the following overt acts, among others, in the Eastern District of Michigan:

Between November 6, 2002 and December 6, 2002, Mahmoud Youssef Kourani and others hosted and conducted meetings at 6050 Argyle Street in Dearborn, Michigan during which donations to Hizballah were solicited.

CRAIG S. MORFORD United States Attorney

KENNETH R. CHADWELL Assistant United States Attorney

KIR Cue

ROBERT P. CARES

Assistant United States Attorney

Dated: March 1, 2005

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Date

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.